

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the
District of New Hampshire

United States of America

v.

PAUL GRACEY

Defendant

Case No. 21-cr-104

21-M. SDN

RECEIVED
JUN 15 2021
U.S. MARSHALS SERVICE

FILED	LODGED
RECEIVED	COPY
OCT 15 2021	
CLERK US DISTRICT COURT DISTRICT OF ARIZONA	
BY	DEPUTY

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Paul Gracey

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

18 USC §1343 Wire Fraud

Date: 06/15/2021City and state: Concord, New Hampshire


Issuing officer's signature

Erica DiFabio, Deputy Clerk

Printed name and title

Return

 This warrant was received on (date) 06/15/21, and the person was arrested on (date) 10/13/21
 at (city and state) Nogales, AZ
Date: 10/14/21
 Subject arrested by Santa Cruz County S.O.
 and initialed on 10/15/21
 in the District of Arizona.

Arresting officer's signature

Printed name and title

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

v.

PAUL GRACEY,

Defendant

Criminal Case No. 21-cr-101-JL-01

Count 1: Wire Fraud
(18 U.S.C. § 1343)

INDICTMENT

The Grand Jury charges:

COUNT ONE

Wire Fraud
18 U.S.C. § 1343

Background Information

1. The Social Security Administration ("SSA") is an agency of the United States government that administers several aid programs for disabled persons, including the Supplemental Security Income ("SSI") program, authorized by Title XVI of the Social Security Act (the "Act"), 42 U.S.C. §§ 1381-85.
2. With limited exception, only residents of the United States are eligible for SSI benefit payments.
3. SSA considers a person to no longer be a resident of the United States if he is outside the country for 30 days or more consecutively.
4. On or about January 13, 2015, the SSA awarded the defendant, PAUL GRACEY, SSI benefits. The award notice stated that GRACEY was required to timely inform the SSA of events that might impact his eligibility for SSI benefits, including whether he moved.

5. On an unknown date, but at least by February 11, 2017, GRACEY moved to Mexico. GRACEY did not notify SSA that he moved to Mexico.

The Scheme and Artifice to Defraud

6. Between in or about April 2017, and continuing through in or about May 2021, in the District of New Hampshire and elsewhere, the defendant knowingly devised and intended to devise a scheme and artifice to defraud the SSA by means of materially false and fraudulent pretenses, representations, and promises. The defendant, knowing that his location was relevant and material to his eligibility for SSI payments, endeavored to conceal that information from the SSA. Had he disclosed his location to the SSA, GRACEY would not have been eligible for SSI benefits.

7. As part of this scheme, the defendant concealed and did not disclose his move to Mexico to the SSA. The defendant also made multiple statements to the SSA falsely representing that he was still in the United States.

8. For example, before receiving his annual 2020 cost-of-living-adjustment notice, GRACEY provided the SSA a Manchester, New Hampshire, address despite living in Mexico.

9. Sometime between November 29, 2020, and February 8, 2021, GRACEY then provided the SSA a Phoenix, Arizona, address despite still living in Mexico.

Wire in Furtherance of the Scheme

10. On or about January 29, 2021, for the purpose of executing the above-described scheme and artifice to defraud, the defendant,

PAUL GRACEY,

caused to be transmitted by means of wire communication in foreign commerce certain writings, signs, and signals. Specifically, GRACEY used Facebook to message with Person 1, an

individual living in Manchester, New Hampshire. GRACEY asked Person 1 to add his name to her "box," to receive paperwork the SSA mailed to GRACEY at her address, and to fill out the paperwork on his behalf to convince the SSA that he was still in the United States.

All in violation of Title 18, United States Code, Section 1343.

NOTICE OF FORFEITURE

The Grand Jury realleges the allegations in Count One for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). Upon conviction, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c) any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

All in accordance to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

Dated: June 14, 2021

/s/ Foreperson
FOREPERSON

JOHN J. FARLEY
ACTING UNITED STATES ATTORNEY

By: /s/ Alexander S. Chen
Alexander S. Chen
Special Assistant U.S. Attorney